



**FRANK & ASSOCIATES, P.C.**  
THE WORKPLACE LAW FIRM

NEIL M. FRANK, ESQ.  
PETER A. ROMERO, ESQ.

October 15, 2013

VIA ECF

The Honorable Joanna Seybert  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

RE: *Tankiewicz v. United Service Workers Union Local 74, et al.*  
13 CV 3914 (JS) (ARL)

Dear Judge Seybert:

This firm represents Plaintiff in the above-referenced action. The parties have conferred and reached an agreement adjusting the briefing schedule for Defendants' motions to dismiss. This is the parties' first request for an adjustment to the briefing schedule. The following is the proposed adjustment:

- a. Plaintiff's opposition papers are to be served by or before November 22, 2013.
- b. Defendants' reply papers are to be served by or before December 23, 2013.

Accordingly, we request the return date to be adjusted to December 23, 2013.

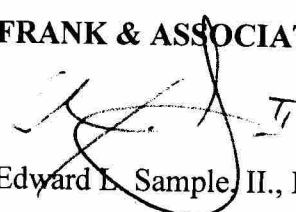
These dates were selected based on counsels' schedules from November 2013 through December 2013 (holidays and scheduled vacations).

For the foregoing reasons, the parties respectfully request the Court's approval of the proposed motions to dismiss briefing schedule.

Thank you for your kind consideration of this request.

*Respectfully submitted,*

**FRANK & ASSOCIATES, P.C.**

  
Edward L. Sample, II., Esq.

cc: Zachary Harkin, Esq. (via ECF)  
Eve Klein, Esq. (via ECF)